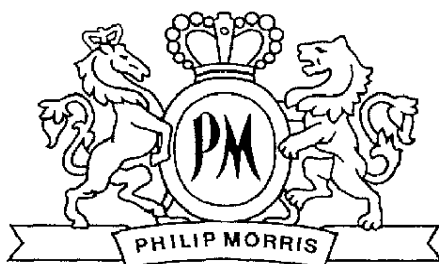




ELECTRONIC
COMMUNICATIONS
POLICY
AND
GUIDELINES FOR
ELECTRONIC MAIL

PHILIP MORRIS COMPANIES INC.

PM3000420987



E-MAIL AND VOICE MAIL POLICY

POLICY

Philip Morris Companies Inc., its operating companies, subsidiaries, divisions and related companies and affiliates ("the Company") recognize that electronic mail ("e-mail") and voice mail play a significant role in the Company's business communications. Policies and standards must govern e-mail and voice mail systems and their usage in order to: (a) promote efficiency, clarity and accuracy in our business communications; (b) protect the Company from liability; (c) ensure the confidentiality of the Company's information assets; and (d) ensure the appropriate use of Company e-mail and voice mail.

Accordingly, this and related policies and standards shall govern e-mail and voice mail use by or with the Company, and each authorized e-mail and voice mail user is deemed to consent to this Policy. The Company reserves the right to change or modify this Policy or any related policies or standards at any time.

DEFINITIONS

E-Mail System - A computer application, and its associated data network, used to transfer a message from a sender to a designated recipient. Examples of e-mail systems presently in use at the Company include PROFS, Microsoft Mail, Microsoft Exchange, UNIX Mail, VAX Mail, Lotus Notes and DISOSS.

E-mail - A message, including notes, documents, files and attachments, transferred or stored on an e-mail system. "E-mail" includes messages transferred using the mail transfer features of an application, such as the "send" command in Microsoft Word or Excel.

External E-mail - An e-mail message that is sent outside of the Company's e-mail system, through the use of the Internet, X.400 communications or some other system.

Company E-Mail System - An e-mail system the Company provides and authorizes for use.

Voice Mail System - A computer application, and its associated hardware components, used to record a spoken telephone message from a caller to a designated recipient. Examples of voice mail systems presently in use at the Company include Octel, VMX, and Audix.

Voice Mail - A message transferred or stored on a voice mail system.

Company Voice Mail System - A voice mail system that the Company provides and authorizes for use.

Authorized User - A person or entity expressly authorized by the Company to use a Company e-mail or voice mail system. Such a person or entity shall be allowed to use a Company e-mail or voice mail system only to the extent authorized and subject to ongoing compliance with this Policy and any related policies or standards.

RESPONSIBILITIES

Authorized Use

The use of Company e-mail and voice mail systems is a privilege that can be withdrawn at any time. This privilege is one which must not be abused. The Company provides e-mail and voice mail access to authorized users for the purpose of conducting official Company business. Frivolous communications that consume the employee's time or the Company's network resources (e.g., chain letters or unverified virus reports) are inappropriate.

Proper business judgment and discretion should be used when sending e-mail. Inappropriate, potentially offensive, improper or harassing e-mail or voice mail, or that which contains obscenity, vulgarity or profanity is prohibited. In addition, e-mail or voice mail which contravenes the Company's Diversity Management, Equal Employment Opportunity, Affirmative Action, Harassment, or other Company policies is prohibited.

Treat all voice mail messages as the business communications which they are. Remember to speak clearly. keep messages brief, recite your phone number slowly, and think before you talk.

Use of e-mail to disseminate copyrighted materials, such as articles or computer software, in violation of copyright laws is prohibited.

Authorized Use (cont'd.)

Use of e-mail systems provided by on-line services, -- such as Internet Service Providers (ISPs), Prodigy, Compuserve and America Online -- through Company facilities, for Company business is prohibited unless authorized by the employee's manager and appropriate Company's Information Services Department. Personal e-mail accounts should not be used to conduct Company business, and should be kept separate from Company systems.

Use of encryption technology in connection with e-mail is prohibited unless authorized by the appropriate Company's Legal Department and provided by the Company's Information Services Department. Use of a Company e-mail or voice mail system to send or receive a message that does not accurately reflect the sender's identity is prohibited. Use of an anonymous remailer or similar system to send or receive e-mail is prohibited.

Authorized users must protect their access to Company e-mail or voice mail systems against unauthorized use. Unauthorized use of another person's e-mail user ID or voice mail password is prohibited.

Absence of Privacy

E-mail or voice mail stored or transferred on Company systems is the property of the Company, subject to the provisions of applicable local law. As noted below, e-mail and voice mail messages are subject to audit and review by the Company or its agents. In addition, under certain circumstances, recorded communications may be obtained by outside parties in the course of litigation. Therefore, authorized users should compose e-mail and voice mail messages with the knowledge that they are business documents and not personal communications, and that they may be retrieved by Company officials, and may in fact become public.

Confidential & Proprietary Information

While the Company takes precautions to ensure that Company e-mail and voice mail systems are secure, it may be possible for an expert to wrongfully obtain e-mail or voice mail. This may be especially true for e-mail sent outside of the Company. Forwarded and misdirected messages also pose risks of inadvertent disclosure. As a result, proper judgment and discretion must always be used when sending confidential and proprietary information via Company e-mail or when leaving voice mail messages.

Certain types of sensitive or confidential information should not be sent via external e-mail, unless adequate security provisions are in place. Any questions concerning whether a particular document or type of document should be sent via e-mail should be directed to your department management.

Records Management

E-mail and voice mail messages must be managed in accordance with applicable Records Management Policies and Procedures.

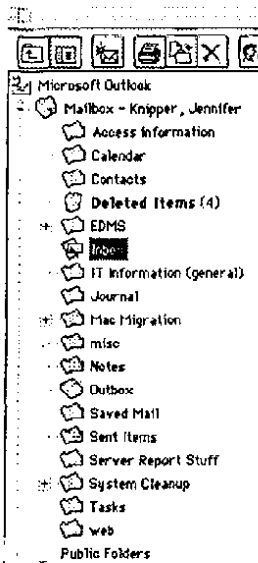
COMPLIANCE

Audit and Review - The Company reserves the right to access, audit, review, delete, disclose or use all e-mail, voice mail, and other information stored or transferred on Company systems at any time without notice and without recourse regardless of the content of the information, subject to the provisions of applicable local law. Use of the Company's e-mail and voice mail systems constitutes each user's consent to such audit, review and management. Upon request from immediate management, an employee shall furnish to the Company all passwords or codes necessary to access the employee's e-mail or voice mail. Every employee that uses a Company e-mail or voice mail system understands and agrees that the Company cannot guarantee and does not undertake to assure that no improper messages will be received by any employee.

Violations - Violations of this Policy or any related policies or standards may be grounds for disciplinary action up to and including termination of employment for Company employees, or termination of the contract(s) and services of an external consultant, vendor, or temporary worker. Some violations could result in civil or criminal liability for the Company or the authorized user.

Reporting Unauthorized Use - Authorized users should report any actual or potential violations of this Policy or any related policies or standards to their manager, department head or Company Human Resources Department, as appropriate.

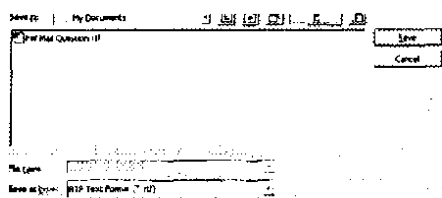
Electronic Mail Guidelines



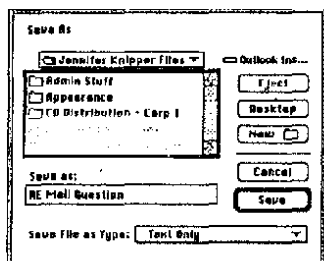
All messages within the InBox, Sent Items and Deleted Items folders will be automatically deleted when they are 60 days old.

In conformance with company policy, any material that is subject to disposal suspension should be printed and retained in printed form prior to the scheduled deletion date.

Notes that must be retained for business reasons should either be saved to a network server or printed and filed as hard copy records.



Any mail messages that need to be retained should be printed and retained prior to the scheduled deletion date.



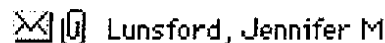
Saving mail messages in Windows:

- Open the e-mail.
- From the message window click on "File."
- Select "Save As."
- Select the appropriate location to save your document.
- Name the document if necessary.
- Click the save button.

Saving mail messages on a Macintosh:

- Open the e-mail.
- Click on "File."
- Select "Save As."
- Select your documents folder or other appropriate location.
- Name the document if necessary.
- Click Save.

Note with inserted file(s):



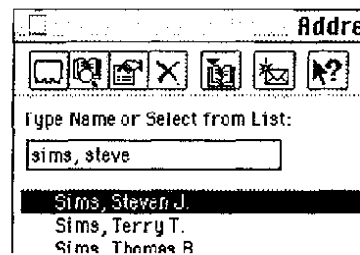
Note: A paper clip icon indicates attached files.

Note: You must save an attached file before you can send it back to the originator or to anyone else.

To save an attached file:

- **Open** the note.
- Double click on the file's icon.
- From the attachment window select **save it to disk** and click **OK**.
- Save it in the C: or G: or A: drive (*Macintosh: save to the Philip Morris drive*).
- Click on the **Save** button. This file is now saved to the location you selected.
- You are required to delete the file from the note.

Addressing a Note:



Sims, Thomas B. on Exchange/Outlook
 Sims, Vivien (KJS-UK) not on Exchange/Outlook

Use the Global Address List to address any messages. Verify recipients before sending the mail message. There are many instances of people with the same names.

Do not create a Personal Address Book unless all addresses are in MS Exchange or MS Outlook.

Note: In the Global Address List a person who DOES NOT have a globe next to their name is an MS Outlook/Exchange address.



DO NOT:

Use "Reply All" unless appropriate.

DO NOT:

Create a Distribution List unless ALL addresses are on Microsoft Exchange or Microsoft Outlook.



ELECTRONIC COMMUNICATIONS POLICY SUMMARY

(These standards apply to electronic mail and voice mail unless otherwise noted.)

TO ALL EMPLOYEES

As you know, electronic communications such as e-mail and voice mail have become an important part of the way we do business at Philip Morris, and will no doubt become even more important in the years ahead.

Our ability to use e-mail and voice mail to communicate rapidly and effectively with each other and our business partners is a real advantage for our Company. That's why it is vital that we all understand Philip Morris' position regarding the proper use of our electronic communications.

The key points about the use of electronic communications are contained in the Philip Morris E-Mail and Voice Mail Policy, which I urge you to read. If you have any questions, please contact your manager, your Human Resources representative, or the Information Systems Department.

Geoff Bible

- Geoff Bible

- Never use profanity.
- Never send discourteous or offensive messages, and avoid attempts at humor.
- Limit distribution to necessary parties.
- Use only Company-provided or authorized systems.
- If you change e-mail before forwarding it, clearly indicate every change.
- Indicate that messages should not be forwarded if you don't want them forwarded.
- Don't forward messages or voice mail labeled "Do not forward."
- Be certain that your message is directed to the proper recipients.
- Follow records retention procedures.
- Log off your e-mail or institute a password to protect your workstation when you leave your desk.
- Immediately report inappropriate use to your manager or Company Human Resources Department.

DID YOU KNOW?

E-mail and voice mail may be permanent and retrievable even if deleted.

Your messages can be audited or reviewed and are not private.

Inappropriate use could have serious consequences for you and the Company

External e-mail systems provided by on-line services - such as Internet Service Providers (ISPs), Prodigy, Compuserve and America On-Line - should not be used for Company business unless specifically approved by your manager and Information Services Department.

PROCEDURES YOU MUST FOLLOW

Always consider the following guidelines before sending messages:

- Access is provided for conducting Company business.
- Use businesslike, courteous and clear language.

IMPORTANT RULES

Don't read misdirected messages. Return them to sender.

Always use utmost care and discretion when sending confidential and proprietary business information.

Never send messages under someone else's name.

Unauthorized use of another person's user ID or password is prohibited.

Always keep your password private.

SPECIAL REMINDERS

When sending an e-mail attachment, identify software and versions.

Ask your manager about training.

Remember: Electronic communications are not always the most appropriate method of communication. Sometimes a phone call, a memo, or a face-to-face meeting is better.

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